

Leonard Beer as Executor of the Estate of Alan Beer, Harry Leonard Beer, Anna Beer, Phyllis Maisel, Estelle Carroll, Sarri Anne Singer, Judith Singer, Eric M. Singer, Robert Singer, Julie Averbach for the Estate of Steven Averbach, Julie Averbach, Tamir Averbach, Devir Averbach, Sean Averbach, A.A., a minor, Maida Averbach for the Estate of David Averbach, Maida Averbach, Michael Averbach, Eileen Sapadin, Daniel Rozenstein, Julia Rozenstein Schon, Alexander Rozenstein, Esther Rozenstein, Jacob Steinmetz, Deborah Steinmetz, Jacob Steinmetz and Deborah Steinmetz for the Estate of Amichai Steinmetz, Nava Steinmetz, Orit Mayerson, Natanel Steinmetz, Robert L. Coulter, Sr. for the Estate of Janis Ruth Coulter, Dianne Coulter Miller, Robert L. Coulter, Sr., Robert L. Coulter, Jr., Larry Carter as Administrator of the Estate of Diane Leslie Carter, Larry Carter, Shaun Choffel, Richard Blutstein and Katherine Baker for the Estate of Benjamin Blutstein, Richard Blutstein, Katherine Baker, Rebekah Blutstein, Nevenka Gritz for the Estate of David Gritz, Nevenka Gritz, Nevenka Gritz for the Estate of Norman Gritz, Jacqueline Chambers as the Administrator for the Estate of Esther Bablar, Jacqueline Chambers, Levana Cohen, Eli Cohen, Sarah Elyakim, Yehuda Agababa, Menache Agababa, Yehezkel Agababa, Greta Geler, Ilana Eropa Dorfman, Refael Kitsis and Tova Guttman as the Administrators for the Estate of Hannah Rogen, Akiva Anachovich, Temima Spetner, Jason Kirschenbaum, Isabelle Kirschenbaum, Isabelle Kirschenbaum for the Estate of Martin Kirschenbaum, Joshua Kirschenbaum, Shoshana Burgett, David Kirschenbaum, Danielle Teitelbaum, Netanel Miller, Chaya Miller, Arie Miller, Altea Steinherz, Jonathan Steinherz, Baruch Yehuda Ziv Brill, Chaya Beili, Bennett and Paula Finer as Guardians for Chana Nachanberg, David Nachenberg, S.N., a minor, Bennett Finer, Paula Finer, Zev Finer, Shoshana Finer Ohana, Mina Dora Green, Mina Dora Green for the Estate of Howard M. Green, Steven Greenbaum for the Estate of Judith Greenbaum, Steven Greenbaum, Alan Hayman, Shirlee

Hayman, David Danzig, Neil Danzig for the Estate of Rebecca Danzig, Neil Danzig, Hayyim Danzig, Sarah Pearlman, Clara Ben-Zaken Laser, Netanel Herskovitz, Martin Herskovitz, Pearl Herskovitz, Yaakov Herskovitz, Joshua Faudem, Zohar Fater, Bruce Mazer, Orly Rom, Richard Coffey, Gal Ganzman, Judith Buchman-Ziv, Ora Cohen, Mirav Cohen, Daniel Cohen, O.C., a minor, S.C. a minor, E.N.C., a minor, Faiga Zvia Lieberman, Einat Noked for the Estate of Eyal Noked, Einat Noked, A.N., Avishag Noked, Baruch Zuri Noked, Binyamin Elkana Noked, Neta Nechama Cohen, T.N., Karen Goldberg, Chana Weiss, Esther Goldberg, Yitzhak Goldberg, Shoshana Goldberg, Eliezer Goldberg, Y.M.G., a minor, T.Y.G., a minor, Nilly Choman, and Gila Aluf filed their fifth amended complaint (“Strauss Action”) against Credit Lyonnais, S.A. (“Defendant”).

WHEREAS, Plaintiffs’ counsel in the Strauss Action have also been retained by Aharon Miller, Shani Miller, Adiya Miller, Peter Steinherz, Laurel Steinherz, Joseph Ginzberg, Temima Steinherz, and Joseph Cohen (“Additional Strauss Plaintiffs”).

WHEREAS, on June 17, 2016, The Estate of Bernice Wolf, Ari Horovitz, Batsheva Horovitz Sadan, David Horovitz, The Estate of Debra Ruth Horovitz, The Estate of Elnatan Horovitz, The Estate of Leah Horovitz, The Estate of Moshe Horovitz, Nechama Horovitz, Shulamite Horovitz, Tova Horovitz Naiman, Tvi Horovitz, Uri Horovitz, The Estate of Bryan Wolf, Stanley Wolf, Averham Grossman, Devorah Chechanow Leifer, Joseph Leifer, Bracha Milstein, Shifra Miller, Chaya Rosenberg, Abraham Waxler, Arthur Waxler, Baruch Waxler, Chana Waxler, Dina Waxler, Ezekiel Waxler, Gedalia Waxler, Haggi Waxler, Nachum Waxler, Obadiah Waxler, Yaakov Waxler, Yoel Waxler, Zacharia Waxler, Nethaniel Bluth, Moshe Naimi, Faye Chana Benjaminson, The Estate of Moshe Gottlieb, Seymour Gottlieb, Sheila Gottlieb, Philip Litle, The Estate of Abigail Litle, Elishua Litle, Hannah Litle, Heidi Litle, Josiah

Litle, Noah Litle, Fran Strauss Baxter, William J. Baxter, Ariela Freirmark, Menachem Freirmark, Hadassah Freirmark, Phyllis Pam, Rivka Pam, Reena Pam, Shoshana Tita, Ezra Tita, Ephraim Tita, Ephriam Tita for the Estate of Bertin Tita, Rachel Potolski, Ovadia Topporowitch, Yisrael Topporowitch, Yitzchak Topporowitch, Miriam Ehrenfeld, Joseph Rose, Leibel Reinitz, Malvia Reinitz, Margali Reinitz, Mendy Reinitz, Miriam Reinitz, Rivka Reinitz, Samuel Reinitz, Shmuel Reinitz, Yakov Reinitz, The Estate of Yissocher Dov Reinitz, The Estate of Mordechai Reinitz, Yitzchok Reinitz, Raizel Shimon Leah Tauber, Helen Weider, Avrohom D. Richter, Breina Richter, Miriam Leah Richter, Moshe Richter, Nechama Richter, Sara Malka Richter, Shlomo Chaim Richter, Tranne Richter, Yakov Yosef Richter, The Estate of Mordechai Reinitz, Yechiel Richter, Yehudis Richter, Yisroel Richter, Yitzchok Richter, Perl Brailofsky, Malky Breuer, Ester Buxbaum, Gittel Cohen, Chaya Freisel, Rachel Rosner, Elizabeth Schwartz, Jacob Schwartz, Max Schwartz, Michael Schwartz, Phillip Schwartz, Abraham Zarkowsky, Aron Zarkowsky, Bshava Zarkowsky Richter, The Estate of Eli Zarkowsky, Ezriel Zarkowsky, Gittel Zarkowsky, The Estate of Goldie Zarkowsky, Joseph Zarkowsky, Mendel Zarkowsky, Miriam Zarkowsky, Shrage Zarkowsky, Trany Zarkowsky, Yehuda Zarkowsky, The Estate of David Applebaum, The Estate of Naava Applebaum, Debra Applebaum, The Estate of Jacqueline Applebaum, Natan Applebaum, Shira Applebaum, Yitzchak Applebaum, Shayna Applebaum, Tovi Belle Applebaum, Geela Applebaum Gordon, Chaya Tziporah Cohen and Erik Schecter (collectively, "Wolf Plaintiffs"), filed their amended complaint ("Wolf Action") against Credit Lyonnais, S.A. ("Defendant").

WHEREAS, Plaintiffs' counsel in the Wolf Action have also been retained by Ephriam Bluth, individually and as the Legal Representative of Shoshana Bluth, Tsipora Batya Bluth Reicher, Isaac Menachem Bluth, Yigal Amichai Bluth, Aryeh Yehuda Bluth, Chanina Samuel

Bluth, Abraham Aharon Bluth, Joseph Shimshon Bluth, Nathan Pam, Raziel Pam, and Neemah Pam Fisher (“Additional Wolf Plaintiffs”).

WHEREAS, the Strauss Plaintiffs, Wolf Plaintiffs, Additional Strauss Plaintiffs, Additional Wolf Plaintiffs, and Defendant Credit Lyonnais, S.A. seek to avoid the administrative burden of filing and responding to new actions that allege the same or similar facts as those alleged in the above-captioned cases;

NOW, THEREFORE, it is stipulated and agreed as follows:

1. The Additional Strauss Plaintiffs may be added to the Strauss Action pursuant to Fed. R. Civ. P. 15(d) by filing a Supplemental Complaint within ten days of the entry of this order that sets forth the Additional Strauss Plaintiffs’ names and nationalities and the dates, places and manners in which they were injured. None of the Additional Strauss Plaintiffs will be designated to testify at a liability trial.
2. The Additional Wolf Plaintiffs may be added to the Wolf Action pursuant to Fed. R. Civ. P. 15(d) by filing a Supplemental Complaint within ten days of the entry of this order that sets forth the Additional Wolf Plaintiffs’ names and nationalities and the dates, places and manners in which they were injured. None of the Additional Wolf Plaintiffs will be designated to testify at a liability trial.
3. The Additional Wolf Plaintiffs and Additional Strauss Plaintiffs need not re-serve process upon Defendant, and may serve their Supplemental Complaints by serving a copy of that document upon Defendant’s Counsel.
4. The terms of this Stipulation and Order shall not preclude Defendant from asserting any defense to the claims asserted by any Wolf Plaintiff, Strauss Plaintiff, Additional Wolf Plaintiff or Additional Strauss Plaintiff. Nor shall the

terms of this Stipulation and Order preclude the Defendant from opposing any request by the Plaintiffs to add parties other than the Additional Wolf Plaintiffs and Additional Strauss Plaintiffs to their respective actions through the filing of another Supplemental Complaint or otherwise.

5. The Defendant need not file a separate responsive pleading with respect to the individual claims asserted by the Additional Wolf Plaintiffs or Additional Strauss Plaintiffs. If and when any Supplemental Complaint is filed pursuant to this Stipulation and Order, the Defendant will be deemed to have moved pursuant to its pending Motion for Summary Judgment, and for the reasons set forth therein, for dismissal of that Supplemental Complaint. Neither the Defendant, the Additional Wolf Plaintiffs nor the Additional Strauss Plaintiffs shall file any additional briefing with respect to that motion.
6. Claims asserted by the Additional Wolf Plaintiffs and Additional Strauss Plaintiffs pursuant to the terms of this Stipulation and Order will be considered to have been filed on the date the Stipulation and Order is filed by the parties with the Court and shall not relate back to the date the original complaint in this action was filed. However, Defendant acknowledges that, for limitations purposes, the Additional Wolf Plaintiffs' and Additional Strauss Plaintiffs' claims will be treated as if filed on the date of the filing of this Stipulation and [Proposed] Order.

Dated: New York, New York
December 18, 2018

Respectfully submitted,

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SO ORDERED:

Dated: _____, 2018

Mag. Judge Robert M. Levy, U.S.D.C.